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November 9, 1999

Magalie Roman Salas
Office of the Secretary
Federal Communications Commission (FCC)
The Portals
445 Twelfth Street SW
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Washington, DC 20554

**In the Matter of Closed Captioning Requirements
for Digital Television Receivers**

ET Docket No. 99-254

**Comments of Sheila Conlon Mentkowski, Thomas Mentkowski, and
Alexander Mentkowski**

We are a three deaf member family who would like to comment on the Closed Captioning Requirements for Digital Television Receivers and would also like to take this opportunity to thank the FCC for initiating this proceeding.

We encourage the FCC to adopt EIA-708 Section 9 in its entirety, to fully capitalize on the new television digital features. We would like to address the following since the three of us have been viewing captioned television for quite a number of years as captions developed. Sheila and Tom were among the first deaf people who purchased the Sears TV with captions. Our 12 year old hard of hearing son Alexander has grown up watching TV with captions.

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Size of Captions: The existing FCC captioning standard does not provide the ability for the viewer to change the size of the closed captions. This has been a problem for individuals who have low vision including many senior citizens. This is also a problem for those sitting at a distance from smaller TVs with lower case captioned lettering. New digital technologies (and the EIA-708 standard) enable viewers to control the size of captions which is often referred to as 'caption volume control'. We urge the FCC to adopt the full EIA-708 standard which will allow viewers to alter the size of captions the same way they can adjust the sound of the TV's volume.

Color: EIA-708 as a whole would permit users to choose from a variety of foreground and background colors so that viewers can create contrasts against various backgrounds. The proposed FCC standard as drafted is unnecessarily limiting as it would only require decoders to use solid black backgrounds.

Font: EIA-708, Section 9 proposes only one font. But EIA-708 in its entirety would permit viewers to choose among 8 different fonts. The FCC should adopt a standard that offers viewers the most choices available with the new digital technologies, especially for those who need different color contrast options to see optimally.

Number of Captioning Services: The FCC's rules currently require decoders to be capable of decoding captioning data for two (2) captioning services at the same time. In fact, most TV receivers can decode up to four (4) captioning streams. The proposed standard, Section 9, would only require decoders to decode and process data for one captioning service. This is not only too limiting, it actually takes a step backward. The FCC should adopt a standard that requires digital television equipment to decode all of the standard and extended digital services six (6) standard services and up to 57 additional extended services.

Dual Mode Receivers: We support the FCC's proposal to require DTV receivers to operate in a dual mode as this would decode programming sent in both analog and digital formats. This will be important as we go through the transition from analog to digital TV.

DTV Converter Boxes and Tuners: We support the FCC's proposal to require DTV converter boxes and tuners to decode closed captions in either the analog or digital format. This should be required regardless of the size of the television to which the converter or tuner is connected.

Additional Standards: The FCC should take this opportunity to fix some existing problems with television receivers. Specifically, the FCC should create the following mandates:


If captions are chosen by the viewer, they should not be cut off when the television is turned off or the channel is changed. In other words, consumers should not have to continually turn on captions each time they turn on the TV or change a channel. If captions are chosen, this should become the default mode.

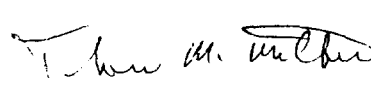
The captioning feature and mute feature should not be connected. A viewer should not have to turn on mute to receive captions. This makes it impossible for mixed (hearing and deaf/hard of hearing) audiences to watch television together. As a matter of fact the ability to have both the captions and the volume assists and enables some hard of hearing and deaf viewers to realize how to pronounce some words they wouldn't otherwise know how they were pronounced.

It should be easy to access captions through a button on the remote and through a first menu of choices. Viewers should not have to go through long menu mazes to figure out how to obtain captions. This is particularly important in hotels and other locations where the viewer is not familiar with the television equipment.

In closing, we urge the FCC to adopt the EIA standard in its entirety. We appreciate and thank the FCC for the opportunity to publicly participate in this very important proceeding for the deaf and hard of hearing viewers and their families.

Sincerely,


Sheila Conlon Mentkowski


Thomas Mentkowski


Alex Mentkowski